

BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA

Order Instituting Rulemaking to Continue
Implementation and Administration of California
Renewables Portfolio Standard Program.

Rulemaking 06-05-027
(Filed May 25, 2006)

**SDG&E's AUGUST 2008 SEMI-ANNUAL COMPLIANCE
REPORT PURSUANT TO THE CALIFORNIA
RENEWABLES PORTFOLIO STANDARD**

August 15, 2008

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CALIFORNIA'S RENEWABLES PORTFOLIO STANDARD

Reporting and Compliance Worksheet Instructions

1. California's RPS Program requires Investor Owned Utilities (IOU), Multi-Jurisdictional Utilities (MJU), and Electric Service Providers (ESP) file a minimum of two reports each year illustrating performance within the program.
 - > The March 1 report (with updates after the California Energy Commission (CEC) verifies procurement, as needed) is used by the Commission to determine compliance for the prior year(s). This report states historic performance in the RPS program, current year targets and procurement data, and forecasts targets and procurement data for at least three years (D.06-10-050, page 45, 49).
 - > The August 1 report states historic performance in the RPS program, current year targets and procurement data, and forecasts targets and procurement levels for each year forward through 2020 (D.06-10-050, page 45, 51). The August report may be used by the Commission to make a final determination of compliance for the prior year(s).
2. If any load serving entity (LSE) seeks confidentiality protection for any of the information required by the RPS Compliance Report, it shall comply with the substantive and procedural rules set forth in D.06-06-066, as modified by D.08-04-023, the Commission's decision in its Confidentiality proceeding, Rulemaking (R.) 05-06-040, and any subsequent decisions issued in the same or successor proceeding. A declaration for Confidentiality should include the identification of all redacted information by tab name and cell reference.
3. RPS compliance reports will be submitted to the Commission as specified below:
 - > Serve a public version on the service list in proceeding R.06-05-027
 - > File a confidential version with the Energy Division
4. Any questions regarding the completion and/or filing of this report can be directed to:
Sean Simon, Energy Division, California Public Utilities Commission: svn@cpuc.ca.gov, (415) 703-3791
5. Please make sure that the following information about the filing entity is included on each tab:
 - > Name of the LSE filing the Report
 - > Date the Report is being filed
6. Include a Title Page in accordance with the Commission's Rules of Practice and Procedure (Rule 1.6)
7. Complete the Officer Verification Form in the format provided (Rule 1.11)
8. Yellow cells throughout the spreadsheet indicate user supplied data by the LSE where and when applicable.
9. All data must be entered in MWh out to three decimal points to accurately account for retail sales, procurement and targets. The spreadsheet will display MWh throughout. Do not round any reporting data.
10. The spreadsheet included in this report has locked cells to ensure that targets, procurement and penalties are accurately calculated and reported from the data provided by the user. An unprotected version of the spreadsheet is also available by request.
11. Line #'s in the "Accounting" tab hyperlink to the "Calculations" tab, which provides additional information on the particular line item or section of the "Accounting" tab.

SUMMARY TAB

12. The "Summary" tab is linked to the "Accounting" tab and "Procurement Detail" tab, no data entry is required.
13. If the LSE determines that additional information is required in order to present a full and complete report, mark the box provided on the "Summary" tab. Any additional information should support the LSE's claim within the guidelines of the eight allowable reasons for noncompliance. Furthermore, please state anything else the filing LSE believes is necessary for a full and complete reporting to the Commission in order to allow an informed decision on compliance. This may include, for example, footnotes and other explanatory information as necessary and reasonable.

ACCOUNTING TAB

14. Begin by entering the relevant data for Lines 1-3, this will calculate the LSE's Baseline Procurement Amount. Enter actual and forecasted sales figures to generate Incremental Procurement Targets (IPTs) and Annual Procurement Targets (APTs).
15. In deficit years, the spreadsheet calculates what portion of the deficit is eligible for IPT deferral and Earmarking. The user records how they elect to treat the deficit(s) in the relevant sections, including using surplus procurement. The spreadsheet calculates the allowable IPT deferral and Earmarking amount through 2020.

EARMARKING DETAIL TAB

16. Enter information for contracts that are eligible for earmarking and are being used for flexible compliance purposes. Data populates the earmarking section in the "Accounting" tab.

PROCUREMENT DETAIL TAB

17. Procurement Summary: Total RPS Eligible Procurement is differentiated by three categories, *existing and or signed contracts*, *short-listed/under negotiation/pending approval*, and *generic future contracts*. This section is populated by completing the Contract Detail section below. If the LSE has entered into contracts that are short-term or with existing facilities but cannot meet its Annual Minimum Contracting Requirement, then deliveries from those contracts may not be used for compliance in any year (D.07-05-028).

> *Annual Contracting Quota Requirement*: LSEs must enter into long-term contracts or contracts with new facilities for energy deliveries equivalent to at least 0.25% of that LSE's prior years' retail sales, if it intends to use deliveries from short-term contracts and/or existing facilities, for RPS compliance purposes.

- Contracts are differentiated by Contract term-length and type (row 15:16). All deliveries from "long-term and/or new" are automatically entered into "Cumulative Surplus Contracting Quota Bank" (row 19) and the user must input the MWh in row 18 that the LSE needs to comply with the Annual Contracting Quota Requirement, if necessary.

18. RPS Eligible Procurement by Resource Type: This report must state the amount procured or projected to be procured from each resource type (D.05-07-039, Appendix A, D.06-10-050, page 47-48). This information is reported in rows 25-38 in the "Procurement Detail" tab and populated by completing the "Contract Detail" section.

19. Contract Detail: For each contract, enter actual and forecasted delivery data throughout the contract term. Do not assume that an expiring contract will be renegotiated. In the first year a project is no longer under contract, remove the contract and/or MWh deliveries (in the case of pre-2002 contracts), and list the contract in the Expired Contracts section below.

> *Pre-2002 Contracts*: Input total annual deliveries by resource type

> *2002-2008 years' Contracts*: List contracts by name, annual deliveries (MWh), project status, facility status and resource type.

> *2005-2008 years' Contracts*: In addition to the requirements above, Contracts from these years should be identified by term-length, short-term (less than 10 years) and long-term, as well as, by type, existing or new (defined below). For 2005 and 2006 contracts that were signed prior to 2007 can be identified as "n/a" for this purpose (refer to Column "X").

- *"Contract Length / Type"* (Column "X") Pursuant to D.07-05-028, starting in 2007, each RPS-obligated LSE must, in order to be able to count for any RPS compliance purpose energy deliveries from contracts of less than 10 years' duration ("short-term") with RPS-eligible facilities that commenced commercial operation prior to January 1, 2005 ("existing facilities"), in each calendar year enter into contracts with facilities of at least 10 years' duration ("long-term") and/or short-term contracts with facilities that commenced commercial operation on or after January 1, 2005 ("new facilities") for energy deliveries equivalent to at least 0.25% of that LSE's prior year's retail sales ("minimum quantity").

- *"Contract Volume"* (Column "Y") Input the total annual MWh as identified in the contract. Compliance with the minimum quota requirement is measured by contracted-for-energy, not deliveries.

> *"Generic Future Contracts"*: Input total forecasted annual deliveries by resource type

> *"Expired Contracts"*: User should identify expired contract by name and input annual deliveries (MWh) in the first year contract is no longer delivering for the LSE (per existing contract) and in every year thereafter. For example, if a contract with annual deliveries of 10,000 MWh expired 12/31/2007, user should enter 10,000 MWh in 2008 and in every year thereafter. If this same contract expired 6/30/2007, user should enter 5,000 MWh in 2007 and 10,000 in every year thereafter. If an expired or expiring contract is re-signed, remove contract information from "Expired Contracts" section and enter it under the appropriate contracting year, as you would for any other contract.

20. In the "Contract Status" column, "short-listed and/or under negotiation" is an option; use the short-listed option only for projects for which the IOU has a high level of confidence that a contract will be executed.

21. If any procurement data for a specific contract differs from what is entered into the CEC-RPS-Track form for that year, the specific cell should be highlighted and the discrepancy should be explained.

Spreadsheet user notes

> Protecting confidential data: Individual cells may be formatted black, which will serve to redact info when excel file is converted to pdf. Select cell - click on "fill color" icon - choose black. Note: Once converted to pdf, additional steps are necessary to ensure redacted data is not accessible.

> Adding and/or deleting rows. The "Earmarking Detail" tab and "Procurement Detail" tab allow user add to or delete rows. Within the desired section, highlight entire row(s) by selecting the excel row number(s) - right click and select "copy" - right click again and select "insert copied cells"

RPS Compliance Report: Summary

SDG&E	2004
15-Aug	

RPS Summary Report	MWh	%
Prior Year Total Retail Sales	15,043,865	
Annual Procurement Target (APT)	446,625	3.0%
Total RPS Eligible Procurement	677,852	4.5%
Annual Procurement Surplus/(Deficit)	231,227	
Adjusted Procurement Percentage*		4.5%

* 'Adjusted Procurement Percentage' includes flexible compliance as proposed by the LSE, it is not necessarily used to determine compliance.

RPS Eligible Procurement	MWh	%
Biomass	337,466	49.8%
Digester Gas	23,451	3.5%
Biodiesel	0	0.0%
Landfill Gas	189,024	27.9%
Muni Solid Waste	0	0.0%
<i>Biopower Subtotal</i>	549,941	81.1%
Geothermal	0	0.0%
Small Hydro	0	0.0%
Conduit Hydro	13,134	1.9%
Solar PV	0	0.0%
Solar Thermal	0	0.0%
Wind	114,778	16.9%
Ocean/Tidal	0	0.0%
Fuel Cells	0	0.0%
Total RPS Eligible Procurement	677,852	100.0%

Flexible Compliance	MWh
IPT Deferral	0
Earmarking	N/A
Banked Procurement Applied	0
Total Flexible Compliance	0

Deficits and Penalties	2004
Preliminary Procurement (Deficit)	0
Adjusted Annual Procurement Deficit	0
Adjusted Deficit Deferred	0
Potential Penalty	\$0
Current Penalty (with flexible compliance)	\$0

** Potential Penalty is calculated based on 'Adjusted Annual Procurement Deficit' and may be deferred or waived if LSE provides allowable reasons and/or uses flexible compliance.

☐ Check box (x) if LSE is including supplemental materials necessary for a full and complete report (include attachments as needed).

- Any supplemental materials should state each reason asserted in support of deferral or waiver of penalty, consistent with allowable reasons for non-compliance listed below. (D.03-12-065, D.03-06-071, D.06-05-010 and Public Utilities Code Section 399.14(a)(2)(C)(ii).)

[Insufficient response to RFO, Contracts already executed will provide future deliveries sufficient to satisfy current year deficits, Inadequate public goods funds to cover above-market costs, Seller non-performance, Lack of effective competition, Deferral promotes ratepayer interests and RPS objectives, Showing of good cause, Insufficient transmission]

- If stating earmarked contracts as a reason for a temporary deferral, make sure contract names and planned energy deliveries match what is listed in "Earmarking Detail" and "Procurement Detail" tabs.

RPS Compliance Report: Summary

SDG&E	2005
15-Aug	

RPS Summary Report	MWh	%
Prior Year Total Retail Sales	15,811,591	
Annual Procurement Target (APT)	604,741	3.8%
Total RPS Eligible Procurement	825,366	5.2%
Annual Procurement Surplus/(Deficit)	220,625	
Adjusted Procurement Percentage*		5.2%

* 'Adjusted Procurement Percentage' includes flexible compliance as proposed by the LSE, it is not necessarily used to determine compliance.

RPS Eligible Procurement	MWh	%
Biomass	298,945	36.2%
Digester Gas	23,768	2.9%
Biodiesel	0	0.0%
Landfill Gas	194,455	23.6%
Muni Solid Waste	0	0.0%
<i>Biopower Subtotal</i>	517,168	62.7%
Geothermal	0	0.0%
Small Hydro	0	0.0%
Conduit Hydro	11,764	1.4%
Solar PV	0	0.0%
Solar Thermal	0	0.0%
Wind	296,434	35.9%
Ocean/Tidal	0	0.0%
Fuel Cells	0	0.0%
Total RPS Eligible Procurement	825,366	100.0%

Flexible Compliance	MWh
IPT Deferral	0
Earmarking	0
Banked Procurement Applied	0
Total Flexible Compliance	0

Deficits and Penalties	2005
Preliminary Procurement (Deficit)	0
Adjusted Annual Procurement Deficit	0
Adjusted Deficit Deferred	0
Potential Penalty	\$0
Current Penalty (with flexible compliance)	\$0

** Potential Penalty is calculated based on 'Adjusted Annual Procurement Deficit' and may be deferred or waived if LSE provides allowable reasons and/or uses flexible compliance.

☐ Check box (x) if LSE is including supplemental materials necessary for a full and complete report (include attachments as needed).

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[Insufficient response to RFO, Contracts already executed will provide future deliveries sufficient to satisfy current year deficits, Inadequate public goods funds to cover above-market costs, Seller non-performance, Lack of effective competition, Deferral promotes ratepayer interests and RPS objectives, Showing of good cause, Insufficient transmission]

- If stating earmarked contracts as a reason for a temporary deferral, make sure contract names and planned energy deliveries match what is listed in "Earmarking Detail" and "Procurement Detail" tabs.

RPS Compliance Report: Summary

SDG&E	2006
15-Aug	

RPS Summary Report	MWh	%
Prior Year Total Retail Sales	16,001,516	
Annual Procurement Target (APT)	764,756	4.8%
Total RPS Eligible Procurement	899,520	5.6%
Annual Procurement Surplus/(Deficit)	134,765	
Adjusted Procurement Percentage*		5.6%

* 'Adjusted Procurement Percentage' includes flexible compliance as proposed by the LSE, it is not necessarily used to determine compliance.

RPS Eligible Procurement	MWh	%
Biomass	284,031	31.6%
Digester Gas	21,243	2.4%
Biodiesel	0	0.0%
Landfill Gas	179,895	20.0%
Muni Solid Waste	0	0.0%
<i>Biopower Subtotal</i>	485,169	53.9%
Geothermal	0	0.0%
Small Hydro	0	0.0%
Conduit Hydro	11,584	1.3%
Solar PV	0	0.0%
Solar Thermal	0	0.0%
Wind	402,768	44.8%
Ocean/Tidal	0	0.0%
Fuel Cells	0	0.0%
Total RPS Eligible Procurement	899,520	100.0%

Flexible Compliance	MWh
IPT Deferral	0
Earmarking	0
Banked Procurement Applied	0
Total Flexible Compliance	0

Deficits and Penalties	2006
Preliminary Procurement (Deficit)	0
Adjusted Annual Procurement Deficit	0
Adjusted Deficit Deferred	0
Potential Penalty	\$0
Current Penalty (with flexible compliance)	\$0

** Potential Penalty is calculated based on 'Adjusted Annual Procurement Deficit' and may be deferred or waived if LSE provides allowable reasons and/or uses flexible compliance.

☐ Check box (x) if LSE is including supplemental materials necessary for a full and complete report (include attachments as needed).

- Any supplemental materials should state each reason asserted in support of deferral or waiver of penalty, consistent with allowable reasons for non-compliance listed below. (D.03-12-065, D.03-06-071, D.06-05-010 and Public Utilities Code Section 399.14(a)(2)(C)(ii).)

[Insufficient response to RFO, Contracts already executed will provide future deliveries sufficient to satisfy current year deficits, Inadequate public goods funds to cover above-market costs, Seller non-performance, Lack of effective competition, Deferral promotes ratepayer interests and RPS objectives, Showing of good cause, Insufficient transmission]

- If stating earmarked contracts as a reason for a temporary deferral, make sure contract names and planned energy deliveries match what is listed in "Earmarking Detail" and "Procurement Detail" tabs.

RPS Compliance Report: Summary

SDG&E	2007
15-Aug	

RPS Summary Report	MWh	%
Prior Year Total Retail Sales	16,846,888	
Annual Procurement Target (APT)	933,225	5.5%
Total RPS Eligible Procurement	880,777	5.2%
Annual Procurement Surplus/(Deficit)	(52,447)	
Adjusted Procurement Percentage*		5.5%

* 'Adjusted Procurement Percentage' includes flexible compliance as proposed by the LSE, it is not necessarily used to determine compliance.

RPS Eligible Procurement	MWh	%
Biomass	217,967	24.7%
Digester Gas	18,466	2.1%
Biodiesel	0	0.0%
Landfill Gas	153,184	17.4%
Muni Solid Waste	0	0.0%
<i>Biopower Subtotal</i>	389,617	44.2%
Geothermal	0	0.0%
Small Hydro	0	0.0%
Conduit Hydro	21,302	2.4%
Solar PV	0	0.0%
Solar Thermal	0	0.0%
Wind	469,859	53.3%
Ocean/Tidal	0	0.0%
Fuel Cells	0	0.0%
Total RPS Eligible Procurement	880,777	100.0%

Flexible Compliance	MWh
IPT Deferral	0
Earmarking	0
Banked Procurement Applied	52,447
Total Flexible Compliance	52,447

Deficits and Penalties	2007
Preliminary Procurement (Deficit)	(52,447)
Adjusted Annual Procurement Deficit	0
Adjusted Deficit Deferred	0
Potential Penalty	\$0
Current Penalty (with flexible compliance)	\$0

** Potential Penalty is calculated based on 'Adjusted Annual Procurement Deficit' and may be deferred or waived if LSE provides allowable reasons and/or uses flexible compliance.

☐ Check box (x) if LSE is including supplemental materials necessary for a full and complete report (include attachments as needed).

- Any supplemental materials should state each reason asserted in support of deferral or waiver of penalty, consistent with allowable reasons for non-compliance listed below. (D.03-12-065, D.03-06-071, D.06-05-010 and Public Utilities Code Section 399.14(a)(2)(C)(ii).)

[Insufficient response to RFO, Contracts already executed will provide future deliveries sufficient to satisfy current year deficits, Inadequate public goods funds to cover above-market costs, Seller non-performance, Lack of effective competition, Deferral promotes ratepayer interests and RPS objectives, Showing of good cause, Insufficient transmission]

- If stating earmarked contracts as a reason for a temporary deferral, make sure contract names and planned energy deliveries match what is listed in "Earmarking Detail" and "Procurement Detail" tabs.

RPS COMPLIANCE REPORT - August 2008

RPS Compliance Report: Accounting

SDG&E
8/15/2008

Line#	RPS Baseline Calculation	(MWh)
1	2001 Total Retail Sales	14,998,806
2	2001 RPS Eligible Procurement	146,760
3	2003 Total Retail Sales	15,043,865
4	2003 Baseline Procurement Amount	296,186

	Input Required
	Forecasted Data
	Actual Data

	Actual					Forecast			Forecast			Forecast						
	2003	2004	2005	2006	2007	2008	2009	2010	2011	2012	2013	2014	2015	2016	2017	2018	2019	2020
5	Bundled Retail Sales	15,043,865	15,811,591	16,001,516	16,846,888	17,056,023					19,044,058	19,346,534	19,649,906	19,949,935	20,237,522	20,522,220	20,810,607	21,102,513
6	Total RPS Eligible Procurement	549,856	677,852	825,366	899,520	880,777	1,071,035	1,731,223	2,644,980	3,674,587	4,225,533	4,146,892	4,130,060	4,146,045	4,146,045	4,113,689	3,750,738	3,354,180
7	Annual Procurement Target (APT)	296,186	446,625	604,741	754,758	933,225						3,147,338	3,809,812	3,869,207	3,929,982	3,989,987	4,047,584	4,104,444
8	Incremental Procurement Target (IPT)	N/A	150,439	158,116	160,015	168,469						64,578	61,473	60,495	60,005	57,578	56,880	57,677
9	Preliminary Procurement Surplus/Deficit	253,670	231,227	220,625	134,765	(52,447)						401,344	321,249	276,738	216,983	125,682	(296,826)	(540,261)
10	APT Percentage	N/A	3.0%	3.8%	4.6%	5.5%						20.0%	20.0%	20.0%	20.0%	20.0%	20.0%	20.0%
11	Actual Procurement Percentage	3.7%	4.5%	5.2%	5.6%	5.5%						22.1%	21.7%	21.4%	21.1%	20.6%	18.5%	17.4%
12	Adjusted Procurement Percentage*	N/A	4.5%	5.2%	5.6%	5.5%						22.1%	21.7%	21.4%	21.1%	20.6%	18.5%	17.4%

	Actual					Forecast			Forecast			Forecast						
	2003	2004	2005	2006	2007	2008	2009	2010	2011	2012	2013	2014	2015	2016	2017	2018	2019	2020
13	Maximum Deficit Eligible for Deferral	N/A	0	0	0	42,117					0	0	0	0	0	0	0	0
14	Deficit being Carried Forward to Year + 1	N/A	0	0	0	0					0	0	0	0	0	0	0	0
15	Deficit being Carried Forward to Year + 2	N/A	0	0	0	0					0	0	0	0	0	0	0	0
16	Deficit being Carried Forward to Year + 3	N/A	0	0	0	0					0	0	0	0	0	0	0	0
17	Total Current Year Deficit Carried Forward	N/A	0	0	0	0					0	0	0	0	0	0	0	0
18	Remaining Deficit from Year - 1 to Be Filled in Current Year	N/A	N/A	0	0	0					0	0	0	0	0	0	0	0
19	Remaining Deficit from Year - 2 to Be Filled in Current Year	N/A	N/A	N/A	0	0					0	0	0	0	0	0	0	0
20	Remaining Deficit from Year - 3 to Be Filled in Current Year	N/A	N/A	N/A	N/A	0					0	0	0	0	0	0	0	0
21	Total Prior Year Deficits That Must Be Filled This Year	N/A	N/A	0	0	0					0	0	0	0	0	0	0	0
22	Current Year Surplus Procurement Applied to Year - 1 Deficit	N/A	N/A	0	0	0					0	0	0	0	0	0	0	0
23	Current Year Surplus Procurement Applied to Year - 2 Deficit	N/A	N/A	N/A	0	0					0	0	0	0	0	0	0	0
24	Current Year Surplus Procurement Applied to Year - 3 Deficit	N/A	N/A	N/A	N/A	0					0	0	0	0	0	0	0	0
25	Total Deliveries Applied to Prior Year IPT Deficits	N/A	N/A	0	0	0					0	0	0	0	0	0	0	0

	Actual					Forecast			Forecast			Forecast						
	2003	2004	2005	2006	2007	2008	2009	2010	2011	2012	2013	2014	2015	2016	2017	2018	2019	2020
26	Portion of Current Year Deficit Eligible for Earmarking	N/A	0	0	0	10,330					0	0	0	0	0	246,232	468,955	747,056
27	Future Year Deliveries Earmarked from Year + 1	N/A	N/A	0	0	0					0	0	0	0	0	0	0	0
28	Future Year Deliveries Earmarked from Year + 2	N/A	N/A	0	0	0					0	0	0	0	0	0	0	0
29	Future Year Deliveries Earmarked from Year + 3	N/A	N/A	0	0	0					0	0	0	0	0	0	0	0
30	Total Projected Procurement Earmarked to Current Year	N/A	N/A	0	0	0					0	0	0	0	0	0	0	0
31	Current Year Deliveries Earmarked to Year - 1	N/A	N/A	N/A	0	0					0	0	0	0	0	0	0	0
32	Current Year Deliveries Earmarked to Year - 2	N/A	N/A	N/A	N/A	0					0	0	0	0	0	0	0	0
33	Current Year Deliveries Earmarked to Year - 3	N/A	N/A	N/A	N/A	N/A					0	0	0	0	0	0	0	0
34	Total Deliveries Earmarked to Prior Year Earmarked Deficits	N/A	N/A	N/A	0	0					0	0	0	0	0	0	0	0

	Actual					Forecast			Forecast			Forecast						
	2003	2004	2005	2006	2007	2008	2009	2010	2011	2012	2013	2014	2015	2016	2017	2018	2019	2020
35	Surplus Procurement Bank Balance as of Prior Year	0	253,670	484,697	705,522	840,267	767,840				2,041,464	2,442,808	2,764,057	3,040,795	3,256,859	3,382,541	3,382,541	3,382,541
36	Application of Banked Surplus Procurement to Current Year Deficit					52,447												
37	Adjusted Current Year Annual Surplus Procurement	253,670	231,227	220,625	134,765	0					401,344	321,249	276,738	216,983	125,682	0	0	0
38	Cumulative Surplus Procurement Bank Balance	253,670	484,697	705,522	840,267	797,840					2,442,808	2,764,057	3,040,795	3,256,859	3,382,541	3,382,541	3,382,541	3,382,541

	Actual					Forecast			Forecast			Forecast						
	2003	2004	2005	2006	2007	2008	2009	2010	2011	2012	2013	2014	2015	2016	2017	2018	2019	2020
39	Adjusted Deficit	N/A	0	0	0	0					0	0	0	0	0	(296,826)	(540,261)	(799,082)
40	Adjusted Annual Procurement Deficit	N/A	0	0	0	0					0	0	0	0	0	0	0	0
41	Adjusted Deficit Deferred	N/A	0	0	0	0					0	0	0	0	0	0	0	0
42	Potential Penalty (with flexible compliance)	N/A	\$0	\$0	\$0	\$0					0	0	0	0	0	0	0	0

RPS Compliance Report: Earmarking Detail

	Input Required	SDG&E
	Forecasted Data	8/15/2008
	Actual Data	

[illegible][illegible]

RPS Compliance Report: Procurement Detail

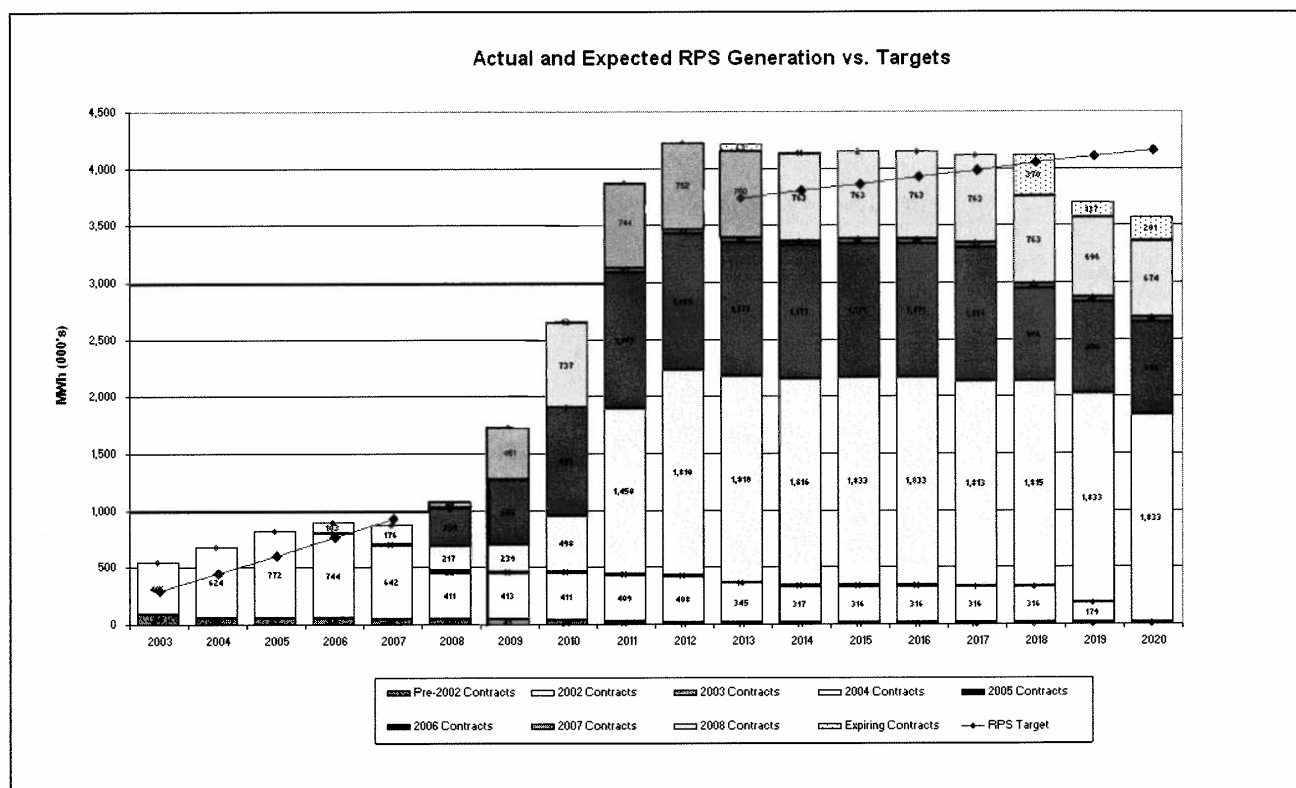
	Input Required	SDG&E
	Forecasted Data	8/15/200
	Actual Data	

506AE
6/15/200

Procurement Summary	Actual With					Forecast With					Forecast With					Forecast With				
	2003	2004	2005	2006	2007	2008	2009	2010	2011	2012	2013	2014	2015	2016	2017	2018	2019	2020		
Total GPS Single Procurement	\$48,000	\$17,500	\$26,500	\$0	\$0	\$9,777	\$1,077,500	\$1,735,000	\$2,650,000	\$3,435,000	\$4,265,000	\$5,080,000	\$5,845,000	\$6,610,000	\$7,375,000	\$8,140,000	\$8,905,000	\$9,670,000		
GPS Single Contracts	\$48,000	\$17,500	\$26,500	\$0	\$0	\$9,777	\$1,077,500	\$1,735,000	\$2,650,000	\$3,435,000	\$4,265,000	\$5,080,000	\$5,845,000	\$6,610,000	\$7,375,000	\$8,140,000	\$8,905,000	\$9,670,000		
GPS Single Contracts (Excluding Parking Expense)	N/A	N/A	N/A	N/A	N/A	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0		
GPS Single Contracts (Including Parking Expense)	N/A	N/A	N/A	N/A	N/A	\$9,777	\$1,077,500	\$1,735,000	\$2,650,000	\$3,435,000	\$4,265,000	\$5,080,000	\$5,845,000	\$6,610,000	\$7,375,000	\$8,140,000	\$8,905,000	\$9,670,000		
Annual Contracting Quota Requirement	N/A	N/A	N/A	N/A	N/A	N/A	43,000	44,400	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A		
GPS Contracts (Including Parking Expense)	N/A	N/A	N/A	N/A	N/A	N/A	237,617	237,617	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A		
GPS Contracts (excluding fees with existing licenses)	N/A	N/A	N/A	N/A	N/A	N/A	237,617	237,617	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A		
GPS Contracts (excluding fees with 2 or 4 Year Term)	N/A	N/A	N/A	N/A	N/A	N/A	237,617	237,617	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A		
Contracting Quota (Excluding 2 or 4 Year Term)	N/A	N/A	N/A	N/A	N/A	N/A	237,617	237,617	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A		
Contracting Quota (Including 2 or 4 Year Term)	N/A	N/A	N/A	N/A	N/A	N/A	237,617	237,617	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A		
Contracting Quota (Including 2 or 4 Year Term)	N/A	N/A	N/A	N/A	N/A	N/A	237,617	237,617	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A		
Contracting Quota (Including 2 or 4 Year Term)	N/A	N/A	N/A	N/A	N/A	N/A	237,617	237,617	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A		
Contracting Quota (Including 2 or 4 Year Term)	N/A	N/A	N/A	N/A	N/A	N/A	237,617	237,617	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A		
Contracting Quota (Including 2 or 4 Year Term)	N/A	N/A	N/A	N/A	N/A	N/A	237,617	237,617	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A		
Contracting Quota (Including 2 or 4 Year Term)	N/A	N/A	N/A	N/A	N/A	N/A	237,617	237,617	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A		
Contracting Quota (Including 2 or 4 Year Term)	N/A	N/A	N/A	N/A	N/A	N/A	237,617	237,617	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A		
Contracting Quota (Including 2 or 4 Year Term)	N/A	N/A	N/A	N/A	N/A	N/A	237,617	237,617	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A		
Contracting Quota (Including 2 or 4 Year Term)	N/A	N/A	N/A	N/A	N/A	N/A	237,617	237,617	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A		
Contracting Quota (Including 2 or 4 Year Term)	N/A	N/A	N/A	N/A	N/A	N/A	237,617	237,617	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A		
Contracting Quota (Including 2 or 4 Year Term)	N/A	N/A	N/A	N/A	N/A	N/A	237,617	237,617	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A		
Contracting Quota (Including 2 or 4 Year Term)	N/A	N/A	N/A	N/A	N/A	N/A	237,617	237,617	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A		
Contracting Quota (Including 2 or 4 Year Term)	N/A	N/A	N/A	N/A	N/A	N/A	237,617	237,617	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A		
Contracting Quota (Including 2 or 4 Year Term)	N/A	N/A	N/A	N/A	N/A	N/A	237,617	237,617	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A		
Contracting Quota (Including 2 or 4 Year Term)	N/A	N/A	N/A	N/A	N/A	N/A	237,617	237,617	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A		
Contracting Quota (Including 2 or 4 Year Term)	N/A	N/A	N/A	N/A	N/A	N/A	237,617	237,617	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A		
Contracting Quota (Including 2 or 4 Year Term)	N/A	N/A	N/A	N/A	N/A	N/A	237,617	237,617	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A		
Contracting Quota (Including 2 or 4 Year Term)	N/A	N/A	N/A	N/A	N/A	N/A	237,617	237,617	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A		
Contracting Quota (Including 2 or 4 Year Term)	N/A	N/A	N/A	N/A	N/A	N/A	237,617	237,617	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A		
Contracting Quota (Including 2 or 4 Year Term)	N/A	N/A	N/A	N/A	N/A	N/A	237,617	237,617	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A		
Contracting Quota (Including 2 or 4 Year Term)	N/A	N/A	N/A	N/A	N/A	N/A	237,617	237,617	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A		
Contracting Quota (Including 2 or 4 Year Term)	N/A	N/A	N/A	N/A	N/A	N/A	237,617	237,617	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A		
Contracting Quota (Including 2 or 4 Year Term)	N/A	N/A	N/A	N/A	N/A	N/A	237,617	237,617	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A		
Contracting Quota (Including 2 or 4 Year Term)	N/A	N/A	N/A	N/A	N/A	N/A	237,617	237,617	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A		
Contracting Quota (Including 2 or 4 Year Term)	N/A	N/A	N/A	N/A	N/A	N/A	237,617	237,617	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A		
Contracting Quota (Including 2 or 4 Year Term)	N/A	N/A	N/A	N/A	N/A	N/A	237,617	237,617	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A		
Contracting Quota (Including 2 or 4 Year Term)	N/A	N/A	N/A	N/A	N/A	N/A	237,617	237,617	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A		
Contracting Quota (Including 2 or 4 Year Term)	N/A	N/A	N/A	N/A	N/A	N/A	237,617	237,617	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A		
Contracting Quota (Including 2 or 4 Year Term)	N/A	N/A	N/A	N/A	N/A	N/A	237,617	237,617	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A		
Contracting Quota (Including 2 or 4 Year Term)	N/A	N/A	N/A	N/A	N/A	N/A	237,617	237,617	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A		
Contracting Quota (Including 2 or 4 Year Term)	N/A	N/A	N/A	N/A	N/A	N/A	237,617	237,617	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A		
Contracting Quota (Including 2 or 4 Year Term)	N/A	N/A	N/A	N/A	N/A	N/A	237,617	237,617	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A		
Contracting Quota (Including 2 or 4 Year Term)	N/A	N/A	N/A	N/A	N/A	N/A	237,617	237,617	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A		
Contracting Quota (Including 2 or 4 Year Term)	N/A	N/A	N/A	N/A	N/A	N/A	237,617	237,617	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A		
Contracting Quota (Including 2 or 4 Year Term)	N/A	N/A	N/A	N/A	N/A	N/A	237,617	237,617	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A		
Contracting Quota (Including 2 or 4 Year Term)	N/A	N/A	N/A	N/A	N/A	N/A	237,617	237,617	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A		
Contracting Quota (Including 2 or 4 Year Term)	N/A	N/A	N/A	N/A	N/A	N/A	237,617	237,617	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A		
Contracting Quota (Including 2 or 4 Year Term)	N/A	N/A	N/A	N/A	N/A	N/A	237,617	237,617	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A		
Contracting Quota (Including 2 or 4 Year Term)	N/A	N/A	N/A	N/A	N/A	N/A	237,617	237,617	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A		
Contracting Quota (Including 2 or 4 Year Term)	N/A	N/A	N/A	N/A	N/A	N/A	237,617	237,617	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A		
Contracting Quota (Including 2 or 4 Year Term)	N/A	N/A	N/A	N/A	N/A	N/A	237,617	237,617	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A		
Contracting Quota (Including 2 or 4 Year Term)	N/A	N/A	N/A	N/A	N/A	N/A	237,617	237,617	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A		
Contracting Quota (Including 2 or 4 Year Term)	N/A	N/A	N/A	N/A	N/A	N/A	237,617	237,617	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A		
Contracting Quota (Including 2 or 4 Year Term)	N/A	N/A	N/A	N/A	N/A	N/A	237,617	237,617	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A		
Contracting Quota (Including 2 or 4 Year Term)	N/A	N/A	N/A	N/A	N/A	N/A	237,617	237,617	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A		
Contracting Quota (Including 2 or 4 Year Term)	N/A	N/A	N/A	N/A	N/A	N/A	237,617	237,617	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A		
Contracting Quota (Including 2 or 4 Year Term)	N/A	N/A	N/A	N/A	N/A	N/A	237,617	237,617	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A		
Contracting Quota (Including 2 or 4 Year Term)	N/A	N/A	N/A	N/A	N/A	N/A	237,617	237,617	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A		
Contracting Quota (Including 2 or 4 Year Term)	N/A	N/A	N/A	N/A	N/A	N/A	237,617	237,617	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A		
Contracting Quota (Including 2 or 4 Year Term)	N/A	N/A	N/A	N/A	N/A	N/A	237,617	237,617	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A		
Contracting Quota (Including 2 or 4 Year Term)	N/A	N/A	N/A	N/A	N/A	N/A	237,617	237,617	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A		
Contracting Quota (Including 2 or 4 Year Term)	N/A	N/A	N/A	N/A	N/A	N/A	237,617	237,617	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A		
Contracting Quota (Including 2 or 4 Year Term)	N/A	N/A	N/A	N/A	N/A	N/A	237,617	237,617	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A		
Contracting Quota (Including 2 or 4 Year Term)	N/A	N/A	N/A	N/A	N/A	N/A	237,617	237,617	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A		
Contracting Quota (Including 2 or 4 Year Term)	N/A	N/A	N/A	N/A	N/A	N/A	237,617	237,617	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A		
Contracting Quota (Including 2 or 4 Year Term)	N/A	N/A	N/A	N/A	N/A	N/A	237,617	237,617	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A		
Contracting Quota (Including 2 or 4 Year Term)	N/A	N/A	N/A	N/A	N/A	N/A	237,617	237,617	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A		
Contracting Quota (Including 2 or 4 Year Term)	N/A	N/A	N/A	N/A	N/A	N/A	237,617	237,617	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A		
Contracting Quota (Including 2 or 4 Year Term)	N/A	N/A	N/A	N/A	N/A	N/A	237,617	237,617	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A		
Contracting Quota (Including 2 or 4 Year Term)	N/A	N/A	N/A	N/A	N/A	N/A	237,617	237,617	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A		
Contracting Quota (Including 2 or 4 Year Term)	N/A	N/A	N/A	N/A	N/A	N/A	237,617	237,617	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A		
Contracting Quota (Including 2 or 4 Year Term)	N/A	N/A	N/A	N/A	N/A	N/A	237,617	237,617	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A		
Contracting Quota (Including 2 or 4 Year Term)	N/A	N/A	N/A	N/A	N/A	N/A	237,617	237,617	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A		
Contracting Quota (Including 2 or 4 Year Term)	N/A	N/A	N/A	N/A	N/A	N/A	237,617	237,617	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A		
Contracting Quota (Including 2 or 4 Year Term)	N/A	N/A	N/A	N/A	N/A	N/A	237,617	237,617	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A		
Contracting Quota (Including 2 or 4 Year Term)	N/A	N/A	N/A	N/A	N/A	N/A	237,617	237,617	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A		
Contracting Quota (Including 2 or 4 Year Term)	N/A	N/A	N/A	N/A	N/A	N/A	237,617	237,617	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A		
Contracting Quota (Including 2 or 4 Year Term)	N/A	N/A	N/A	N/A	N/A	N/A	237,617	237,617	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A		
Contracting Quota (Including 2 or 4 Year Term)	N/A	N/A	N/A	N/A	N/A	N/A	237,617	237,617	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A		
Contracting Quota (Including 2 or 4 Year Term)	N/A	N/A	N/A	N/A	N/A	N/A	237,617	237,617	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A		
Contracting Quota (Including 2 or 4 Year Term)	N/A	N/A	N/A	N/A	N/A	N/A	237,617	237,617	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A		
Contracting Quota (Including 2 or 4 Year Term)	N/A	N/A	N/A	N/A	N/A	N/A	237,617	237,617	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A		
Contracting Quota (Including 2 or 4 Year Term)	N/A	N/A	N/A	N/A	N/A	N/A	237,617	237,617	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A		
Contracting Quota (Including 2 or 4 Year Term)	N/A	N/A	N/A	N/A	N/A	N/A	237,617	237,617	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A		
Contracting Quota (Including 2 or 4 Year Term)	N/A	N/A	N/A	N/A	N/A	N/A	237,617	237,617	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A		

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RPS Compliance Report: Calculations

RPS Baseline Inputs (MWh)		
Line#	Calculation	Notes
1	User supplied data	Pursuant to D.07-03-046, the 2003 Initial Baseline Procurement Amount for the investor owned utilities (IOUs) is calculated using the following equation:
2	User supplied data	
3	User supplied data	
4	Baseline formula =	
		$\frac{\text{2001 RPS Eligible Procurement}}{\text{2001 Total Retail Sales}} \times \text{2003 Total Retail Sales} + \text{1\% of 2001 Total Retail Sales}$

RPS Procurement and Targets (MWh)		
Line#	Calculation	Notes
5	User supplied data	Annual Retail Sales
6	Data from "Procurement Detail" tab	In current and past years, this line should equal Total RPS Eligible Procurement in procurement detail tab.
7	Prior year Line 7 + Line 8	
8	1% of line 5 {Y-1}	
9	Line 6 - Line 7	
10	Line 7 / Line 5 {Y-1}	
11	Line 6 / Line 5 {Y-1}	In 2003, 2003 RPS procurement is divided by 2001 retail sales rather than 2002 retail sales.
12	(Line 6 + Line 17 + Line 25 + Line 30 + Line 34 + Line 36) / Line 5 {Y-1}	RPS procurement percentage after applying flexible compliance, assuming all allowable planned deliveries come online as planned.

Flexible Compliance - IPT Deferral		
Line#	Calculation	Notes
13	Up to 0.25% of Prior Year Retail Sales	The first year with an IPT, 100% of the IPT can be deferred for up to 3 years without explanation.
14-16	User supplied data	
17	Sum of Lines 14:16	Current year deficit carried forward. Warning if cell value is greater than Line 13.
18-20	Record of Lines 14:16	Deferred IPT obligations due in current year.
21	Sum of Lines 18-20	Total deferred IPT obligations due in current year
22-24	User supplied data	Past year IPT obligations retired with current year surplus procurement. Per accounting rules D. 06-10-050, Attachment A, page 9-10, current year deliveries may only be applied to past year IPT deficits after earmarked deliveries have been subtracted, and after any deliveries needed to meet current year APT have also been subtracted (D.03-06-0711, Conclusion of Law 25).
25	Sum of Lines 22-24	Total current year surplus applied to prior year IPT obligations due in current year

Flexible Compliance - Earmarking		
Line#	Calculation	Notes
26	Line 9 + Line 13 + Line 34	Portion of current year deficit greater than allowable IPT Deferral
27-29	Data from "Earmarking Detail" tab	User supplied data
30	Sum of Lines 27:29	
31-33	Data from "Earmarking Detail" tab	User supplied data. Current year deliveries may only be applied to past year deficits which have been deferred by earmarking, after current year APT has been met (D.03-06-071), Conclusion of Law 25).
34	Sum of Lines 31:33	Total current year surplus subtracted to meet prior years Earmarking obligations due in current year

Surplus Procurement Bank		
Line#	Calculation	Notes
35	Line 38 {Y-1}	
36	User supplied data	
37	Line 9+ Line 25 + Line 34	Current year surplus procurement less any prior year IPT obligations and/or Earmarking obligations
38	Sum of Lines 35:37	

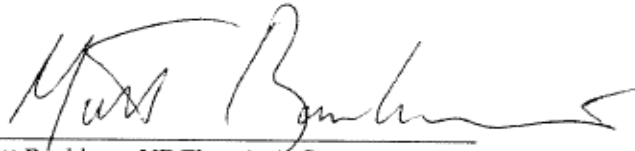
Adjusted Deficit		
Line#	Calculation	Notes
39	Line 9 + balance of IPT obligations after 3 years + balance of Earmarking obligations after 3 years	In any current year, the adjusted annual procurement deficit is the LSE's annual deficit less any deliveries used to meet IPT or Earmarking obligations for prior years deficits. Any portion of adjusted annual procurement deficit that remains after the following three years is subject to penalty.
40	Balance of IPT obligations after 3 years + balance of Earmarking obligations after 3	In any current year, the adjusted deficit temporarily excused is the sum of IPT deferral and Earmarked deliveries (line 17+ line 30). Any portion of line 40 remaining after 3 years will be reflected in line 39 and subject to penalty.
41	Line 39 * \$50.0	Per accounting rules, LSEs must list penalty based the size of on adjusted annual procurement deficit, even if allowable reasons are being given for why the penalty is not yet due and payable. Penalties are assessed at \$0.05/kWh deficit.
42	(Line 39 + 40) * \$50.0	LSE's have the opportunity to make up annual procurement deficits through existing flexible compliance rules. Accordingly, if an LSE has a deficit in year 1, and is able to fully exercise flexible compliance mechanisms, the penalty for year 1 compliance may not apply.

OFFICER VERIFICATION FORM

I am an officer of the reporting corporation herein, and am authorized to make this verification on its behalf. The statements in the foregoing document are true of my own knowledge, except as to matters which are therein stated on information or belief, and as to those matters I believe them to be true. The spreadsheet format used to file this compliance report has not been altered from the version issued or approved by Energy Division.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on August 13, 2008 at San Diego, California.

A handwritten signature in black ink, appearing to read "Matt Burkhart", is written over a horizontal line.

Matt Burkhart, VP Electric & Gas Procurement - SDG&E
(Signature and Title of Corporate Officer)

Matt Burkhart, VP Electric & Gas Procurement - SDG&E
(Signature and Title of Corporate Officer)

**BEFORE THE PUBLIC UTILITIES
COMMISSION OF THE STATE OF CALIFORNIA**

**DECLARATION OF PATRICK CHARLES
REGARDING CONFIDENTIALITY OF CERTAIN DATA**

I, Patrick K. Charles, do declare as follows:

1. I am Senior Energy Administrator in the Electric & Gas Procurement Department for San Diego Gas & Electric Company (“SDG&E”). I have reviewed SDG&E’s August 15, 2008 Renewable Portfolio Standard (“RPS”) Compliance Filing (“August 15 Compliance Filing”), submitted concurrently herewith. In addition, I am personally familiar with the facts and representations in this Declaration and, if called upon to testify, I could and would testify to the following based upon my personal knowledge and/or belief.

2. I hereby provide this Declaration in accordance with D.06-06-066 and D.08-04-023 to demonstrate that the confidential information (“Protected Information”) provided in the August 15 Compliance Filing submitted concurrently herewith, falls within the scope of data protected as pursuant to the IOU Matrix attached to the Commission’s confidentiality decision, D.06-06-066 (the “IOU Matrix”) or under relevant statutory provisions.

3. SDG&E’s Protected Information: The Protected Information, consisting of the information described below, is protected pursuant to the following IOU Matrix categories:

Data at issue	D.06-06-066 Matrix Requirements	How moving party meets requirements
<i>Bundled Retail Sales</i>	Demonstrate that the material submitted constitutes a particular type of data listed in	This data is SDG&E’s forecast of its bundled customer total energy requirements.

	the IOU Matrix	
	Identify the Matrix category or categories to which the data corresponds	This information is protected under IOU Matrix category V.C.
	Affirm that the IOU is complying with the limitations on confidentiality specified in the Matrix for that type of data	In accordance with the limitations on confidentiality set forth in the IOU Matrix, SDG&E requests that the current year projection and the “front three years” of this information be kept confidential.
	Affirm that the information is not already public	SDG&E has not publicly disclosed this information and is not aware that it has been disclosed by any other party.
	Affirm that the data cannot be aggregated, redacted, summarized, masked or otherwise protected in a way that allows partial disclosure.	The information was provided in the form required by the Energy Division. It would not be possible to provide a complete response if the data were to be aggregated, redacted, summarized or masked.
<i>Annual Procurement Target (“APT”), including APT Target Points on the Performance Chart</i>	Demonstrate that the material submitted constitutes a particular type of data listed in the IOU Matrix	Since APT is a formula linked to Bundled Retail Sales Forecasts, disclosure of APT would allow interested parties to easily calculate SDG&E’s Total Energy Forecast – Bundled Customer (MWH).
	Identify the Matrix category or categories to which the data corresponds	This information is protected under IOU Matrix category V.C. – years 2009 – 2012. This information is protected under IOU Matrix category VI.B. – year 2008. ¹

¹ Although the January 25, 2008 *Administrative Law Judge’s Ruling Partially Granting Motions to File Certain Material Under Seal* denied confidential treatment for lines 7-40 (year 2007, ‘Accounting’ tab) of SDG&E’s September 13, 2007 RPS Compliance Report, confidential treatment should be afforded to lines 7-40 (year 2008, ‘Accounting’ tab) of SDG&E’s August 15 Compliance Filing pursuant to IOU Matrix category VI. B. (net short position). These lines of information should be protected under IOU Matrix category VI. B. because SDG&E issued a short term RFO on December 14, 2007 (bids were due on January 11, 2008), and an RFO seeking both short and long term resources issued on March 10, 2008 (for which bids were due April 30, 2008), and consequently disclosure of any net short position that SDG&E may have in 2008 would undermine SDG&E’s bargaining position relative to short term offers.

	Affirm that the IOU is complying with the limitations on confidentiality specified in the Matrix for that type of data	In accordance with the limitations on confidentiality set forth in the IOU Matrix, SDG&E requests that the current year projection and the “front three years” of this information be kept confidential.
	Affirm that the information is not already public	SDG&E has not publicly disclosed this information and is not aware that it has been disclosed by any other party.
	Affirm that the data cannot be aggregated, redacted, summarized, masked or otherwise protected in a way that allows partial disclosure.	The information was provided in the form required by the Energy Division. It would not be possible to provide a complete response if the data were to be aggregated, redacted, summarized or masked.
<i>Incremental Procurement Target (“IPT”)</i>	Demonstrate that the material submitted constitutes a particular type of data listed in the IOU Matrix	Since IPT is a formula linked to Bundled Retail Sales Forecasts, disclosure would allow interest parties to easily calculate SDG&E’s Total Energy Forecast – Bundled Customer (MWH).
	Identify the Matrix category or categories to which the data corresponds	This information is protected under IOU Matrix category V.C. – years 2009 – 2012. This information is protected under IOU Matrix category VI.B. – year 2008. ²
	Affirm that the IOU is complying with the limitations on confidentiality specified in the Matrix for that type of data	In accordance with the limitations on confidentiality set forth in the IOU Matrix, SDG&E requests that the current year projection and the “front three years” of this information be kept confidential.
	Affirm that the information is not already public	SDG&E has not publicly disclosed this information and is not aware that it has been

² See footnote 1, above.

		disclosed by any other party.
	Affirm that the data cannot be aggregated, redacted, summarized, masked or otherwise protected in a way that allows partial disclosure.	The information was provided in the form required by the Energy Division. It would not be possible to provide a complete response if the data were to be aggregated, redacted, summarized or masked.
<i>Preliminary Procurement/Surplus Deficit</i>	Demonstrate that the material submitted constitutes a particular type of data listed in the IOU Matrix	Procurement Surplus/Deficit data must be protected in order to avoid disclosing APT. If APT is disclosed, SDG&E's Bundled Retail Sales data could be calculated.
	Identify the Matrix category or categories to which the data corresponds	This information is protected under IOU Matrix category V.C. – years 2009 – 2012. This information is protected under IOU Matrix category VI.B. – year 2008. ³
	Affirm that the IOU is complying with the limitations on confidentiality specified in the Matrix for that type of data	In accordance with the limitations on confidentiality set forth in the IOU Matrix, SDG&E requests that the current year projection and the “front three years” of this information be kept confidential.
	Affirm that the information is not already public	SDG&E has not publicly disclosed this information and is not aware that it has been disclosed by any other party.
	Affirm that the data cannot be aggregated, redacted, summarized, masked or otherwise protected in a way that allows partial disclosure.	The information was provided in the form required by the Energy Division. It would not be possible to provide a complete response if the data were to be aggregated, redacted, summarized or masked.
<i>APT Percentage</i>	Demonstrate that the material submitted constitutes a particular type of data listed in	Since APT Percentage is a formula linked to Bundled Retail Sales Forecasts,

³ See footnote 1, above.

	the IOU Matrix	disclosure of APT would allow interest parties to easily calculate SDG&E's Total Energy Forecast – Bundled Customer (MWH).
	Identify the Matrix category or categories to which the data corresponds	This information is protected under IOU Matrix category V.C. – years 2009 – 2012. This information is protected under IOU Matrix category VI.B. – year 2008. ⁴
	Affirm that the IOU is complying with the limitations on confidentiality specified in the Matrix for that type of data	In accordance with the limitations on confidentiality set forth in the IOU Matrix, SDG&E requests that the current year projection and the “front three years” of this information be kept confidential.
	Affirm that the information is not already public	The information was provided in the form required by the Energy Division. It would not be possible to provide a complete response if the data were to be aggregated, redacted, summarized or masked.
	Affirm that the data cannot be aggregated, redacted, summarized, masked or otherwise protected in a way that allows partial disclosure.	Since APT Percentage is a formula linked to Bundled Retail Sales Forecasts, disclosure of APT would allow interest parties to easily calculate SDG&E's Total Energy Forecast – Bundled Customer (MWH).
<i>Actual Procurement Percentage</i>	Demonstrate that the material submitted constitutes a particular type of data listed in the IOU Matrix	Actual Procurement Percentage data must be protected in order to avoid disclosing SDG&E's Bundled Retail Sales data.
	Identify the Matrix category or categories to which the data corresponds	This information is protected under IOU Matrix category V.C. – years 2009 – 2012. This information is protected

⁴ See footnote 1, above.

		under IOU Matrix category VI.B. – year 2008. ⁵
	Affirm that the IOU is complying with the limitations on confidentiality specified in the Matrix for that type of data	In accordance with the limitations on confidentiality set forth in the IOU Matrix, SDG&E requests that the current year projection and the “front three years” of this information be kept confidential.
	Affirm that the information is not already public	SDG&E has not publicly disclosed this information and is not aware that it has been disclosed by any other party.
	Affirm that the data cannot be aggregated, redacted, summarized, masked or otherwise protected in a way that allows partial disclosure.	The information was provided in the form required by the Energy Division. It would not be possible to provide a complete response if the data were to be aggregated, redacted, summarized or masked.
<i>Adjusted Procurement Percentage</i>	Demonstrate that the material submitted constitutes a particular type of data listed in the IOU Matrix	Adjusted Procurement Percentage data must be protected in order to avoid disclosing SDG&E’s Bundled Retail Rates data.
	Identify the Matrix category or categories to which the data corresponds	This information is protected under IOU Matrix category V.C. – years 2009 – 2012. This information is protected under IOU Matrix category VI.B. – year 2008. ⁶
	Affirm that the IOU is complying with the limitations on confidentiality specified in the Matrix for that type of data	In accordance with the limitations on confidentiality set forth in the IOU Matrix, SDG&E requests that the current year projection and the “front three years” of this information be kept confidential.
	Affirm that the information is not already public	SDG&E has not publicly disclosed this information and

⁵ See footnote 1, above.

⁶ See footnote 1, above.

		is not aware that it has been disclosed by any other party.
	Affirm that the data cannot be aggregated, redacted, summarized, masked or otherwise protected in a way that allows partial disclosure.	The information was provided in the form required by the Energy Division. It would not be possible to provide a complete response if the data were to be aggregated, redacted, summarized or masked.
<i>Maximum Deficit Eligible for Deferral (“MDEFD”)</i>	Demonstrate that the material submitted constitutes a particular type of data listed in the IOU Matrix	MDEFD data must be protected in order to avoid disclosing IPT. If IPT is disclosed, SDG&E’s Bundled Retail Sales data could be calculated.
	Identify the Matrix category or categories to which the data corresponds	This information is protected under IOU Matrix category V.C. – years 2009 – 2012. This information is protected under IOU Matrix category VI.B. – year 2008. ⁷
	Affirm that the IOU is complying with the limitations on confidentiality specified in the Matrix for that type of data	In accordance with the limitations on confidentiality set forth in the IOU Matrix, SDG&E requests that the current year projection and the “front three years” of this information be kept confidential.
	Affirm that the information is not already public	SDG&E has not publicly disclosed this information and is not aware that it has been disclosed by any other party.
	Affirm that the data cannot be aggregated, redacted, summarized, masked or otherwise protected in a way that allows partial disclosure.	The information was provided in the form required by the Energy Division. It would not be possible to provide a complete response if the data were to be aggregated, redacted, summarized or masked.
<i>Strategies Associated with Application of</i>	Demonstrate that the material submitted constitutes a	Utility net short data is protected under the IOU

⁷ See footnote 1, above.

<i>Flexible Compliance Tools, Surplus Procurement Bank, Adjusted Deficit and Earmarking Detail</i>	particular type of data listed in the IOU Matrix	Matrix. Information regarding the need to use flexible compliance mechanisms including earmarking provisions would signal an RPS procurement shortage and would highlight an RPS net short position.
	Identify the Matrix category or categories to which the data corresponds	This information is protected under IOU Matrix category VI.B.
	Affirm that the IOU is complying with the limitations on confidentiality specified in the Matrix for that type of data	In accordance with the limitations on confidentiality set forth in the IOU Matrix, SDG&E requests that the “front three years” of this information be kept confidential. ⁸
	Affirm that the information is not already public	SDG&E has not publicly disclosed this information and is not aware that it has been disclosed by any other party.
	Affirm that the data cannot be aggregated, redacted, summarized, masked or otherwise protected in a way that allows partial disclosure.	The information was provided in the form required by the Energy Division. It would not be possible to provide a complete response if the data were to be aggregated, redacted, summarized or masked.

The Commission previously considered and approved application of IOU Matrix

confidentiality protection to the categories of information listed above in its

Administrative Law Judge’s Ruling on San Diego Gas & Electric Company’s April 3,

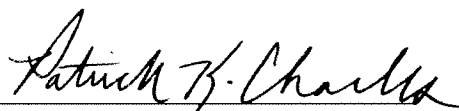
2007 Motion to File Data Under Seal, issued May 4, 2007 in R.06-05-027, its subsequent

⁸ In the case of the ‘Earmarking Detail’ SDG&E requests that data from the current year through 2020 be kept confidential. This is in accordance with the motion filed by SDG&E on May 21, 2007 and the ALJ Ruling issued on June 28, 2007 (*Administrative Law Judge’s Ruling Granting San Diego Gas & Electric Company’s May 21, 2007 Amendment to April 3, 2007 Motion and May 22, 2007 Amendment to August 1, 2006 Motion*) which granted confidential treatment as included in SDG&E’s April 3, 2007 RPS Compliance filing.

Administrative Law Judge's Ruling Granting San Diego Gas & Electric Company's May 21, 2007 Amendment to April 3, 2007 Motion and May 22, 2007 Amendment to August 1, 2006 Motion, issued June 28, 2007 in R.06-05-027, and Administrative Law Judge's Ruling On (A) SDG&E's Motions Regarding Seal Of August 2007 Compliance Report And Amended 2008 RPS Plan Plus (B) Possible Content Of Future Motions, issued March 26, 2008 in R.06-05-027.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Executed this 14th day of August, 2008, at San Diego, California.

A handwritten signature in black ink, reading "Patrick K. Charles". The signature is written in a cursive style with a horizontal line underneath the name.

Patrick K. Charles
Senior Energy Administrator